

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

<p>Ellen S. Ewald,</p> <p style="text-align: center;">Plaintiff,</p> <p>Vs.</p> <p>Royal Norwegian Embassy and Gary Gandrud, Esq.,</p> <p style="text-align: center;">Defendants.</p>	<p style="text-align: center;">Civil No. 11-cv-02116 (SRN/SER)</p> <p style="text-align: center;"><u>PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS</u></p>
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TO: DEFENDANT ABOVE-NAMED AND THEIR ATTORNEYS, FAEGRE & BENSON, SEAN SOMERMEYER, ESQ., DANIEL WILCZEK, ESQ., AND JOEL SCHROEDER, ESQ., 2200 WELLS FARGO CENTER, 90 SOUTH SEVENTH STREET, MINNEAPOLIS, MN 55402-3901

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Ellen S. Ewald ("Ewald") requests that, within thirty (30) days after service of these Requests for Production of Documents, Defendant Royal Norwegian Embassy ("Embassy") produce and permit Plaintiff, by her attorney, to inspect and copy the documents described hereinafter at a time and place to be arranged that is convenient for both parties. These requests are to be deemed continuing so as to require supplemental answers if additional information is obtained by or becomes known to Defendant or anyone acting on Defendant's behalf, such additional information to be provided immediately.

DEFINITIONS AND INSTRUCTIONS

The following requests are to be read, interpreted, and answered with reference to the following definitions and instructions:

1. "You" or "your" means and refers to Defendant Royal Norwegian Embassy ("Embassy") and all of its agents, employees, employers, representatives, insurers, attorneys, and all other persons or entities acting on their behalf.

2. "Person" means a natural person, corporation, partnership, government (or any agency thereof), quasi-public entity, proprietorship, joint venture, trust or estate, and any other form of legal entity.

3. "Representative" means a present and/or former director, officer, employee, agent, attorney, accountant, and any other person acting on behalf of the designated person.

4. "Source" means each document and each person from whom you gained or obtained your facts or information, or on which you base your belief.

5. The term "document" has the broadest meaning that can be ascribed to it pursuant to the Federal Rules of Civil Procedure. Among other things, the term "document" refers to and includes the final form and all drafts and revisions of any type of written or graphic matter, original or reproduced, and all copies thereof which are different in any way from the original, regardless of whether designated "confidential," "privileged," or otherwise restricted. Without limiting the generality of the foregoing, the term "document" includes books, papers, letters, telegrams, memoranda, communications, minutes, notes, e-mail, electronic mail, voice mail, electronic bulletin board postings, electronic records of any sort including metadata concerning such records, schedules, tabulations, vouchers, accounts, statements, affidavits, reports, abstracts, agreements, contracts, diaries, calendars, plans, specifications, drawings, sketches, photostats, photographs, charts, graphs and other similar objects, and any kind of transcript, transcription or recording of any conversation, discussion or oral presentation of any kind, and any information stored on, and reproducible in documentary form from a computer or other electronic, magnetic, optical or laser based information storage device, including but not limited to floppy disks, hard disks, zip drives, tapes, or CD-ROM.

6. "All" and "any" shall each mean "any and all."

7. "And" and "or" shall mean "and/or."

8. "Including" shall mean "including, but not limited to."

9. The term "document(s)" shall include all originals, copies (including, without limitation, nonconforming or marked copies), duplicates, drafts, and recordings of any written, graphic, or otherwise recorded matter, however produced or reproduced.

10. The word "you" or "your" when used in reference to documents shall include documents now or formerly in your actual or constructive possession.

11. If you cannot respond to any document request in full, respond to it to the fullest extent possible, explaining why you cannot respond to the remainder, stating the nature of the information or knowledge which you cannot furnish.

12. If any document is withheld, in whole or in part, for any reason, including, but not limited to, any claim of privilege or confidentiality, set forth separately with respect to each such document:

- A. The author(s) of the document;
- B. The addressee of the document;
- C. The date of the document;
- D. The identity of all recipients of the document;
- E. The subject matter of the document; and
- F. The bases for withholding the document and the factual basis therefore.

13. If any requested document(s) was at one time but is no longer in existence, state separately for each such document: (a) the identity of the author of the document, the date thereof and the identities of all recipients of the document; (b) identification of the document; (c) the information contained therein; (d) the date upon which such document ceased to exist; (e) the circumstances under which it ceased to exist; and (f) the identity of all persons having knowledge or who had knowledge of its contents.

14. As to each document produced, identify with specificity the date and source from which the document was obtained.

15. If you are producing electronically stored information, produce the requested information in the form agreed to by the parties, set forth in Exhibit A to the Rule 26(a) Report.

The electronically stored information you produce must be provided in a reasonably useable form or you must provide technical support to access or use that information. If you object to the requested form in producing electronically stored information, identify the form or forms you intend to use for producing that data.

CONTINUING NATURE OF REQUESTS FOR PRODUCTION OF DOCUMENTS

Each of the following requests is a continuing one. If subsequent to serving an answer to any request you obtain or become aware of further information pertaining to the subject matter of the request, you are required to serve amended answers upon Plaintiff setting forth such information.

DOCUMENT REQUESTS

REQUEST NO. 1: All documents identified, referred to in, related or reviewed in preparing Defendants' Answers to Plaintiff's Interrogatories.

REQUEST NO. 2: All documents to which Defendant or its agents or attorney referred to, reviewed or consulted in preparing its Answer in this matter, including all documents relating to any allegations contained within your Answer.

REQUEST NO. 3: All documentation of wages, benefits and other compensation paid to Ewald during her employment with Defendant.

REQUEST NO. 4: All photographs, videotapes or audio tape recordings which relate to any allegations made in your Answer.

REQUEST NO. 5: All exhibits you intend to introduce at any deposition, hearing, or at the trial of this matter.

REQUEST NO. 6: Copies of Defendant's financial statements, payroll records, and attachments for employees at all the Norwegian Consulates and Embassies in the United States for the past ten years.

REQUEST NO. 7: Copies of Defendant's employment policies, procedures, handbooks notices, postings, benefits information or other materials provided to employees.

REQUEST NO. 8: All documents concerning any communication relating to Plaintiff's employment by or between any current or former employee or other current or former representatives of Defendant and Plaintiff from January 2008 to the present.

REQUEST NO. 9: All documents regarding referencing or discussing compensation for Plaintiff and/or for Anders Davidson.

REQUEST NO. 10: All Employment Agreements for all of the employees at the Honorary Consulate General in Minneapolis from January 2008 to the present.

REQUEST NO. 11: All documents that relate to Ellen Ewald, including diaries, journals, notes, memoranda, calendars, daily planners or similar documents of Gary Gandrud for the time period January 1, 2008 to the present.

REQUEST NO. 12: All documents which contain, reflect, or relate to any instructions or advice given by Defendant (and/or any representative of the Royal Norwegian Embassy) to Gary Gandrud related to supervising Plaintiff and responding to her complaints.

REQUEST NO. 13: All documents which contain, reflect, or relate to any investigation, instructions or advice given to Gary Gandrud related to Anders Davidson's relation and his participation in MobileOn Services, Inc.

REQUEST NO. 14: All documents that relate in any way to Anders Davidson's application for employment, including but not limited to, resume and qualifications, and any negotiations or communications related to his employment agreement.

REQUEST NO. 15: All documents that Defendant has received from any of its officers, managers, agents, current and/or former employees, including, but not limited to, all

correspondence, memoranda, performance reviews, warnings, complaints, and documents relating to salary and/or benefits or other documents for employees of Defendant at the U. S. Embassies and Consulates.

REQUEST NO. 16: All documents that Defendants have sent to Plaintiff before, during and after her employment.

REQUEST NO. 17: All documents Defendant considered or used to determine that the Officer of Business Development warranted a higher salary and benefits than the Higher Education and Research Officer position.

REQUEST NO. 18: All documents provided by Defendant or anyone acting on Defendant's behalf to any expert witness(es) identified in Defendant's answers or responses to Plaintiff's Interrogatories or pursuant to any court scheduling or other orders and subsequently retained by Defendant for purposes of providing an assessment, opinion and/or testifying in this action.

REQUEST NO. 19: All documents that relate to, bear upon or provide evidence of any communications, oral or otherwise, Defendant has had at any time with any current or former agents or employees of Defendant relating to the subject matter of this litigation or the allegations contained in Plaintiff's Complaint. This Request includes, but is not limited to, notes of any telephone conversations Defendant or its personnel might have had with such individuals, cell phone and/or other telephone records.

REQUEST NO. 20: All e-mails and attachments from the electronic mailboxes for Gary Gandrud, Anders Davidson, and Plaintiff that relate to job duties and responsibilities.

REQUEST NO. 21: Please provide copies of any documents containing or concerning criminal arrests, charges or convictions that you may use for impeachment or other purposes concerning any person identified as a potential witness or person with knowledge of relevant facts in this case, whether identified by either Plaintiff or Defendant.

REQUEST NO. 22: Any documents which relate in any way to the allegations contained in Plaintiff's Complaint and/or Defendant's Answer or the facts and circumstance underlying the allegations.

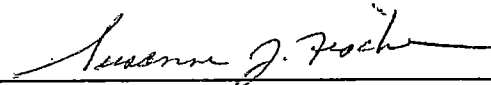
REQUEST NO. 23: Any documents which relate in any way to travel by Anders Davidson as the Innovation and Business Development Officer of the Honorary Consulate General in Minneapolis, including but not limited to, requests for approval of travel, the date, place, purpose, funding source, and amount expended for his travel.

REQUEST NO. 24: All complaints of inequitable or discriminatory conduct against females by the Norwegian Foreign Service since 2002.

REQUEST NO. 25: All gender equity studies or analysis regarding salary, position, or otherwise prepared at the Norwegian Foreign Service since 2002.

REQUEST NO. 26: All notices and legal advisories provided by Norway to employees of the Norwegian Foreign Service.

ENGELMEIER & UMANAH, P.A.

By 
Sheila Engelmeier (#175250)
Thomas E. Marshall (#155597)
Susanne J. Fischer (285353)
Engelmeier & Umanah, P.A.
12 South Sixth Street, Suite 1230
Minneapolis, MN 55402
Ph: (612) 455-7720
Fax: (612) 455-7740
Email: suef@e-ulaw.com/tomm@e-ulaw.com

Dated: August 2 2012.

ATTORNEYS FOR PLAINTIFF